

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

RUSTY STRICKLAND,)	
ALAN AND AMY WEST FARMS,)	
ALAN WEST,)	
AMY WEST,)	
DOUBLE B FARMS, LLC, and)	
BRYAN BAKER,)	
Plaintiffs,)	
)	
v.)	Case No. 2:24-cv-60-Z
)	
THE UNITED STATES DEPARTMENT OF)	
AGRICULTURE,)	
)	
THOMAS J. VILSACK, in his official capacity)	
as Secretary of the United States Department of)	
Agriculture,)	
)	
ZACH DUCHENEAUX, in his official)	
capacity as Administrator of the Farm Service)	
Agency, and)	
)	
THE UNITED STATES OF AMERICA,)	
Defendants.)	

SUPPLEMENTAL DECLARATION OF ALAN WEST

I, Alan West, declare the following:

1. The facts set forth in this declaration are based on my knowledge and, if called as a witness, I can competently testify to their truthfulness under oath. As to those matters that reflect a matter of opinion, they reflect my personal opinion and judgment upon the matter.
2. I am a citizen of the United States, a resident of Texas, over 18 years of age, and have personal knowledge of the facts set forth herein.
3. I am fully competent to make this declaration.

4. I applied to USDA's Natural Resources Conservation Service (NRCS) on behalf of Alan and Amy West Farms for a grant under the Environmental Quality Incentives Program (EQIP) to replace two center pivots on my farm in the summer of 2023.

5. In April of 2024, I received a letter from the Lubbock County NRCS, which administers EQIP, informing me that because I am not an underserved farmer, my grant proposal will be scored lower than if I were and is thus less likely to receive funding.


6. My application is still under consideration.

7. I am also aware of other benefits provided by EQIP that I am not eligible for but may be eligible for if I were of a different race or sex. These benefits include funds NRCS sets aside specifically for underserved farmers as well as higher payment rates and advance payments available to underserved farmers.

8. USDA's decision that I must be a veteran, a new farmer, or struggling to make ends meet to be entitled to the same disaster relief as every other American farmer is stigmatizing and discriminatory. I am aware that USDA, through NRCS, is punishing me because of my race and sex.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: 05/16/2024


(Alan West, 2024 08:11 CDT)
Alan West